



BILL RICHARDSON  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Telephone (505) 428-2500  
Fax (505) 428-2567  
www.nmenv.state.nm.us



RON CURRY  
SECRETARY

DERRITH WATCHMAN-MOORE  
DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 6, 2004

R. Paul Detwiler, Acting Manager  
Carlsbad Field Office  
Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221-3090

Dr. Steven Warren, President  
Washington TRU Solutions LLC  
P.O. Box 2078  
Carlsbad, New Mexico 88221-5608

RE: NMED COMMENTS ON THE LOS ALAMOS NATIONAL LABORATORY FINAL AUDIT  
REPORT, AUDIT A-03-27  
WASTE ISOLATION PILOT PLANT  
EPA I.D. NUMBER NM4890139088

Dear Mr. Detwiler and Dr. Warren:

On December 15, 2003, the New Mexico Environment Department (NMED) received the Final Audit Report of the Los Alamos National Laboratory (LANL) Audit Number A-03-27 (Audit Report), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Washington TRU Solutions LLC (the Permittees) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this annual recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the LANL waste characterization processes for S5000 debris contact-handled waste relative to the requirements of the WIPP Permit. The Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final LANL standard operating procedures (hardcopy only)
- Items corrected during the audit
- Objective evidence examined during the audit
  - General information
  - Acceptable knowledge

040712



- Headspace gas
- Real time radiography
- Visual examination

NMED representatives observed the LANL audit on September 22 – 26, 2003. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions II.C.2 (Audit and Surveillance Program) and II.C.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there were nine deficiencies requiring only remedial actions that were corrected during the audit; four observations identifying conditions that, if not controlled, could result in conditions adverse to quality; and eight recommendations identifying opportunities for improvement. Attached are NMED's general comments based upon observation of the LANL audit and review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns.

NMED concludes that the Audit Report is incomplete in that it does not adequately address all elements examined during the audit. Because of this incompleteness, NMED is withholding approval of the Permittees' Final Audit Report for LANL Audit A-03-27 until the Permittees submit the additional information identified in the attached comments that demonstrate full implementation of all relevant permit requirements. Indicate revisions to any text in the Audit Report and checklists with redline/strikeout annotation.

If you have any questions regarding this matter, please contact me at (505) 428-2512.

Sincerely,



James P. Bearzi  
Chief  
Hazardous Waste Bureau

JPB:soz

Attachment

cc: Charles Lundstrom, NMED WWMD  
Steve Zappe, NMED HWB  
Tracy Hughes, NMED OGC  
Laurie King, EPA Region 6  
Betsy Forinash, EPA ORIA  
Connie Walker, Trinity Engineering  
Don Hancock, SRIC  
Joni Arends, CCNS  
File: Red WIPP '04

**NMED COMMENTS ON THE**  
**LOS ALAMOS NATIONAL LABORATORY (LANL)**  
**FINAL AUDIT REPORT A-03-27**

NMED's review indicated that the Audit Report showed less attention to detail than presented in previous Audit Reports and, unless remedied, this less rigorous approach to preparation could result in significant deficiencies in future Audit Reports. The body of the Audit Report appears to generally address the applicable elements. However, there are some omissions, errors, and inconsistencies including but not limited to the following items:

1. In the Audit Report, Steve Calvert was not listed in Section 3.0 as attending the audit. NMED notes that Mr. Calvert was indeed present at the audit.
2. From the B6 Checklist, pertaining to question 5, the reference QP-00-21, Sections 4.2.9, 4.2.16, 6.2.4, 6.4, and 6.5, there is no Section 4.2.16.
3. From the B6 Checklist, pertaining to question 22, the reference QP-00-024, Attachment 4 (116) is a typographical error and should be QP-00-024. Attachment 4 (16).
4. From the B6 Checklist, pertaining to question 26, two of the references are DTP-00-01 and OSR-OP-120. Due to the fact that the other two references were listed as 'DTP-1.2-008, Entire Procedure and DTP-00-077, Entire', the other procedures should also have "Entire".
5. From the B6 Checklist, pertaining to questions 50, 51, and 52, the reference is given as QP-00-34. Due to the fact that other references were listed as 'DTP-1.2-008, Entire Procedure and DTP-00-077, Entire', this reference should also follow suit and be listed as QP-00-34, "Entire".
6. From the B6 Checklist, pertaining to question 64, the references were given as QP-00-003 and QP-00-035. Due to the fact that several other references were listed with the phrase "Entire", these references should also follow suit.
7. From the B6 Checklist, pertaining to question 65, a reference is listed as QP-11.1-043. There was no such reference in the audit package. This may be a typographical error.
8. From the B6 Checklist, pertaining to question 65, a reference was given as TWCP-DTP-1.2-075. Due to the fact that several other references were listed with the phrase "Entire", this reference should also follow suit.
9. From the B6 Checklist, pertaining to questions 222a and 222b, the referenced procedure CCP-TP-032, Section 4.1.17 does not exist.
10. From the B6 Checklist, pertaining to question 278, the referenced procedures DTP-00-007, Section 7.3.22 and DTP-1.2-008, Section 6.6.12 do not seem to answer the question.